

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN, NORTHERN DIVISION

R. L. Ross,

Plaintiff,

v.

No. 1:14-cv-14122-TLL-PTM

Hon. Judge Thomas L. Ludington

Mag. Judge Patricia T. Morris

DONALD BACHAND, individually
And In His Capacity As Former
Provost, Member Of The Professional
Practices Committee, President Of
Saginaw Valley State University
(SVSU) and Member of the SVSU
Board of Control ("BOC"); **JILL**
WETMORE individually And In Her
Capacity As Dean Of The SVSU
College Of Business And Management
And Member Of The Professional
Practices Committee ("PPC"); **SHAUN**
BANGERT Individually And In Her
Capacity As Faculty Member Of SVSU
And President Of The SVSU Faculty
Association (SVSUFA); **ROBERT**
LANE, Individually And In His
Capacity As President And Past-
President Of The SVSUFA; **DEBORAH**
BISHOP Individually And In Her
Capacity As Professor, Review
Committee Chair, And SVSUFA
Official; **CHRISTOPHER SURFIELD**,
Individually And In His Capacity As
Associate Professor, Review Committee
Chair, And SVSUFA Official;
STEWART FRENCH Individually And
In His Capacity As Professor At SVSU

And Official On The Executive Board
Of The SVSUFA; **SAUN STROBEL** In
Her Capacity As The UNI-SERV
Director For The Michigan Education
Association (MEA) For SVSU;
BROOKS BYAM, Individually And In
His Capacity As A Professor At
Saginaw Valley State University;
HONG PARK, Individually And In
His Capacity As Professor At SVSU;
WILLIAM WILLIAMSON
Individually And In His Capacity As
Professor At SVSU; **ROBERT TUTTLE**
Individually And Professionally In His
Capacity As Professor At SVSU;
MARK MCCARTNEY Individually
And In His Capacity as a Professor at
SVSU; **SURENDER REDDY**
Individually And In His Capacity As A
Professor And Member Of The SVSU
PPC; **DEBORAH HUNTLEY**
Individually And In Her Capacity As
Dean, Provost, Vice President Of
Academic Affairs and Member of the
PPC; **DAVID ABBS**, Individually And
In His Capacity As A Member Of The
BOC; **SCOTT CARMONA**,
Individually And In His Capacity As A
Member Of The SVSU Board Of
Control; **CATHY FERGUSON**,
Individually And In Her Capacity As A
Member Of The SVSU Board Of
Control; **DAVID GAMEZ**,
Individually And In His Capacity As A
Member Of The SVSU Board Of
Control ; **ERIC GILBERTSON**,
Individually And In His Capacity As
President Of SVSU And A Member Of
The SVSU Board Of Control; **JEFFREY**
MARTIN, Individually And In Her

Capacity As A Member Of The SVSU Board Of Control; **JENEE VELASQUEZ**, Individually And In Her Capacity As A Member Of The SVSU Board Of Control; **LEOLA WILSON**, Individually And In Her Capacity As A Member Of The SVSU Board Of Control; **JEROME YANTZ**, Individually And In His Capacity As A Member Of The SVSU Board Of Control; **ERIK TRUMP**, Individually And In His Capacity As A Member Of The SVSU Professional Practices Committee ("PPC"); **GRETCHEN OWOCKI**, Individually And In Her Capacity As A Member Of The PPC; **PATRICIA CAVANAUGH**, Individually And In Her Capacity As A Member Of The PPC; **MARCIA SHANNON**, Individually And In Her Capacity As A Member Of The PPC; **JOHN MOONINGHAM**, Individually And In His Capacity As A Member Of The PPC; **SUSIE EMOND**, Individually And In Her Capacity As A Member Of The PPC; **JOHN DOE** AND **JANE DOE** Individually And In Their Capacity As Employees, Administrators, or otherwise associated with SVSU or SVSUFA; **SAGINAW VALLEY STATE UNIVERSITY**; and **SVSU FACULTY ASSOCIATION**;

Defendants.

Rhonda L. Ross, Pro Se Plaintiff
 29106 Glencastle Drive
 Farmington Hills, MI 48336
 Email: rhondaross@g.harvard.edu

Fillipe S. Iorio (P58741)
 Kurt W. Kline (P72291)
 Kalniz, Iorio & Feldstein, Co., L.P.A.
 Attorneys for Defendants (Bangert,
 Bishop, French, Lane, Strobel, Surfield,

SVSU FA)
4981 Cascade Road, S.E.
Grand Rapids, MI 49546
Telephone: (616) 940-1911
Facsimile: (616) 940-1942
Email: groffice@kiflaw.com

Jamie Hecht Nisidis (P48969)
Braun, Kendrick, Finkbeiner, PLC
4301 Fashion Square Blvd.
Saginaw, MI 48603
Telephone: (989) 498-2100
Facsimile: (989) 799-4666
Email: jamnis@braunkendrick.com

**DEFENDANT’S MOTION FOR EXTENSION OF TIME TO ANSWER AMENDED
COMPLAINT**

NOW COMES Defendants Bangert, Bishop, Lane, French, Surfield, SVSUFA/MEA and Strobel, by and through their attorneys, Kalniz, Iorio & Feldstein, and for their Motion for Extension of Time.

Defendants Bangert, Bishop, Lane, French, Surfield, SVSUFA/MEA and Strobel request an extension of time until **March 18, 2015** to respond to Plaintiff’s First Amended Complaint for all the reasons stated in the attached Brief in Support of Plaintiff’s Motion for Extension of Time to Answer Amended Complaint.

Respectfully submitted,
KALNIZ, IORIO & FELDSTEIN CO., L.P.A.
Attorneys for Defendants

Dated: February 20, 2015

s/ Fil Iorio
Fillipe S. Iorio (P58741)
Kurt W. Kline (P72291)
4981 Cascade Road, S.E.
Grand Rapids, Michigan 49546
Telephone: (616) 940-1911
groffice@kiflaw.com